

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

POLYSCIENCES, INC.

Plaintiff,

v.

JOSEPH T. MASRUD,
MATHEW GRIFFIN, and SEROCHEM LLC.

Defendants.

Civil Action No. 2:20-cv-03649-PBT

**PLAINTIFF’S MOTION FOR LEAVE TO FILE A SUR-REPLY TO
DEFENDANT/COUNTER-PLAINTIFF’S MOTION TO COMPEL
PLAINTIFF/COUNTER-DEFENDANT TO DE-DESIGNATE ITS
ATTORNEYS’ EYES ONLY PRODUCTION AND FOR SANCTIONS**

Plaintiff Polysciences, Inc. (“Polysciences”) moves the Court for leave to file a sur-reply to Defendant Joseph T. Masrud’s (“Masrud”) Motion to Compel Polysciences to De-Designate its Attorneys’ Eyes Only Production and for Sanctions (ECF No. 38) (“Motion to Compel”). A proposed sur-reply brief accompanies this filing. The purpose of the proposed sur-reply submission is to address several inaccuracies and misleading statements that were included in the recent reply filed by Masrud on June 8, 2021 (ECF No. 43).

Further, although filed as a “supplement,” Masrud’s recent submission is essentially a reply to his initial Motion to Compel. Masrud did not request leave to submit this reply. However, to the extent the Court allows this improper filing, Polysciences respectfully requests leave to file the accompanying proposed sur-reply to address the issues mentioned above.

WHEREFORE, Polysciences requests leave to file a sur-reply to Masrud's reply to the Motion to Compel.

Dated: June 16, 2021

Respectfully submitted,

/s/ Eric E. Reed
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the below date, he filed the foregoing with the Court using the ECF system, which will provide notice and a copy to counsel of record.

Date: June 16, 2021

/s/ Eric E. Reed
Eric E. Reed